

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS

CHAMPION MORTGAGE, A DIVISION)	
OF KEY BANK, USA,)	
)	
Plaintiff,)	Civil No. 1:05-cv-10375-WGY
)	
v.)	
)	
IDA M. GREEN, ESTATE OF JAMES C.))	
GREEN, JR., MASSACHUSETTS)	
DEPARTMENT OF REVENUE,)	
INTERNAL REVENUE SERVICE,)	
MASSACHUSETTS DEPARTMENT)	
OF REVENUE - ESTATE TAX DIVISION,)	
FAIR LABOR AND BUSINESS PRACTICES)	
DIVISION OF THE OFFICE OF THE)	
MASSACHUSETTS ATTORNEY GENERAL,)	
GLORIA ROSCOE, and FRANCISCO DePINA,)	
)	
Defendants.)	

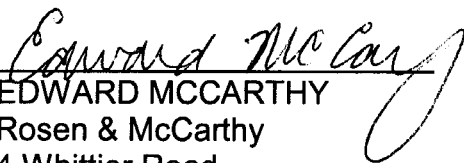
PARTIES' JOINT STATEMENT

The plaintiff and defendant United States of America, by their undersigned counsel, submit their joint statement pursuant to Local Rule 16.1 for the District of Massachusetts as follows:

On December 6, 2004, plaintiff filed the above-captioned interpleader action in state court. On February 8, 2005, the Commonwealth of Massachusetts filed a responsive pleading asserting an interest in the proceeds in that court. On February 28, 2005, the United States removed the action, and on March 9, 2005 filed an answer. All other defendants have been defaulted by the Clerk of the United States District Court for the District of Massachusetts, but a judgment discharging the plaintiff has not been entered as to the defaulted plaintiffs.

The remaining parties, plaintiff Champion Mortgage, defendant United States and defendant Commonwealth of Massachusetts are on the verge of reaching a consensus agreement on priorities and how the funds should be distributed. As a result, the parties do not need time for discovery and request thirty days to submit the final stipulations for approval by the Court, or, if an agreement cannot be reached, thirty days for the filing of dispositive motions by the parties.

PLAINTIFF:
By Its Attorney,


EDWARD MCCARTHY
Rosen & McCarthy
4 Whittier Road
Natick, Massachusetts 01760
(508) 907-6444

DEFENDANT United States:
By Its Attorney,

/s/

LYDIA BOTTOME TURANCHIK
Trial Attorney, Tax Division
U.S. Department of Justice
Post Office Box 55, Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 307-6560
Lydia.D.Bottome@usdoj.gov